REMARKS

Applicant respectfully requests reconsideration and allowance of the subject application.

35 USC § 103

Claims 1-6 stand rejected under 35 USC § 103(a), as being unpatentable over U.S. Patent No. 6,606,525 to Muthuswamy et al. (hereinafter "Muthuswamy") in view of U.S. Patent Application Publication No. 2003/0115066 to Seeley et al. (hereinafter "Seeley").

Claim 1 of the present application, as amended, recites:

> In a voice-extensible-markup-language-enabled voice-application deployment architecture, an application logic for determining which portions of a voice application for deployment should be cached at an application-receiving end system or systems, comprising:
>
> a processor for processing the voice application according to sequential dialog files of the application;
>
> a static content optimizer connected to the processor for identifying files containing static content, wherein the static content optimizer tags the files containing static content with a static tag; and
>
> a dynamic content optimizer connected to the processor for identifying files containing dynamic content, wherein the dynamic content optimizer analyzes previous execution of the voice application to determine whether to cache each file containing dynamic content, and wherein the dynamic content optimizer tags the files containing dynamic content with an appropriate dynamic tag;
>
> characterized in that the optimizers prepare the files containing static content and the files containing dynamic content for distribution to selected end-system cache facilities, based on the tags associated with each content, for local retrieval during consumer interaction with the voice application.

The language of amended claim 1 describes a system that has separate content optimizers for static content and dynamic content. Static content is tagged with a static tag and the

dynamic content is tagged in varying manners based on an analysis of previous execution of the voice application.

The Muthuswamy reference discloses a "System and method of merging static data in web pages". (See Muthuswamy Title). This disclosure of a system and method for merging static data does not disclose or suggest the tagging of content based on an analysis of previous execution of a voice application, as recited in amended claim 1. Such analysis is not relevant to the teachings of Muthuswamy and, accordingly, is not discussed or suggested in the reference.

The Seeley reference discloses "a method to automate the validation of dynamic data presented over telecommunications paths." (See Seeley Abstract). The Seeley reference fails to disclose or suggest the tagging of content based on an analysis of previous execution of a voice application, as recited in amended claim 1. Such analysis is not relevant to the teachings of Seeley which are focused on validation of data, not tagging and caching data. Accordingly, this analysis recited in amended claim 1, is not discussed or suggested by Seeley.

Accordingly, Applicant submits that Muthuswamy and Seeley, alone or in combination, fail to disclose or suggest the teaching amended claim 1. Applicant further submits that the combination of Muthuswamy and Seeley fails to disclose or suggest the invention of claim 1. Since neither Muthuswamy nor Seeley makes any reference to the analysis and tagging of the type disclosed in claim 1, the combination of Muthuswamy and Seeley fails to disclose or suggest this portion of claim 1.

For at least these reasons, Applicant submits that claim 1 is patentable over Muthuswamy in view of Seeley. Given that claims 2-6 depend from claim 1, Applicant

respectfully submits that those claims are likewise allowable over Muthuswamy in view of Seeley for at least the reasons discussed above with respect to claim 1.

Claims 7 and 8 stand rejected under 35 USC § 103(a), as being unpatentable over Muthuswamy in view of Seeley, and further in view of U.S. Patent No. 6,941,512 to Lebin Cheng (hereinafter "Cheng").

The Cheng reference discloses "A method and apparatus for unfolding dynamic web content in a wireless information gateway for presentation on wireless information devices." (See Cheng Abstract). The disclosure of Cheng is related to the handling of content in a wireless environment, and fails to make any reference to tagging of content based on an analysis of previous execution of a voice application. Such analysis and tagging of content is unrelated to the focus of the Cheng reference. As such, the Cheng reference fails to remedy the deficiencies of Muthuswamy and Seeley discussed above with respect to claim 1. Therefore, Applicant respectfully submits that Muthuswamy, Seeley, and Cheng (alone or in any combination thereof) fails to suggest the invention of claim 1.

Accordingly, since claims 7 and 8 depend from claim 1, Applicant respectfully submits that those claims are likewise allowable over Muthuswamy in view of Seeley, and further in view of Cheng.

Claim 9 stands rejected under 35 USC § 103(a), as being unpatentable over Muthuswamy in view of Seeley, and further in view of U.S. Patent Application Publication No. 2002/0019881 to Bokhari et al. (hereinafter "Bokhari").

The Bokhari reference discloses "applying a function to a habitat for universal application of a function to data for output on and/or access from any remote client device." (Paragraph 0008). The disclosure of Bokhari fails to teach or suggest the tagging of content based on an analysis of previous execution of a voice application. This analysis and tagging is not related to the disclosure of Bokhari and, accordingly, is not discussed by the Bokhari reference. As such, Bokhari fails to remedy the deficiencies of Muthuswamy and Seeley discussed above with respect to claim 1. Therefore, Applicant respectfully submits that Muthuswamy, Seeley, and Bokhari (alone or in any combination thereof) fails to suggest the invention of claim 1.

Accordingly, since claim 9 depends from claim 1, Applicant respectfully submits that those claims are likewise allowable over Muthuswamy in view of Seeley, and further in view of Bokhari.

Claims 10 and 11 stand rejected under 35 USC § 103(a), as being unpatentable over Muthuswamy in view of Seeley, and further in view of U.S. Patent Application Publication No. 2004/0123278 to Nanja et al. (hereinafter "Nanja").

The Nanja reference discloses a system for persistent caching of data. The disclosure of Nanja fails to make any reference to tagging of content based on an analysis of previous execution of a voice application. Accordingly, the Nanja reference fails to remedy the deficiencies of Muthuswamy and Seeley discussed above with respect to claim 1. Therefore, Applicant respectfully submits that Muthuswamy, Seeley, and Nanja (alone or in any combination thereof) fails to suggest the invention of claim 1.
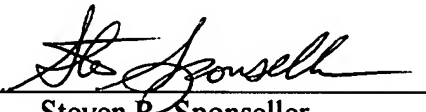
Accordingly, since claims 10 and 11 depend from claim 1, Applicant respectfully submits that those claims are likewise allowable over Muthuswamy in view of Seeley, and further in view of Nanja.

Conclusion

Claims 1-11 are in condition for allowance. Applicant respectfully requests reconsideration and issuance of the subject application. Should any matter in this case remain unresolved, the undersigned attorney respectfully requests a telephone conference with the Examiner to resolve any such outstanding matter.

Respectfully Submitted,

Date: _Aug. 20, 2007_   By: _____

Steven R. Sponseller
Reg. No. 39,384
(509) 389-0584